

**UNITED STATE BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**Robert G. Swan, Esq. RS 01901
3720 Nottingham Way
Hamilton Sq., NJ 08690
609-586-3444**

Attorney for DEBTOR

In Re:	:	Case Number:	20-12612
	:		
Kevin J. Purcell	:	Hearing Date:	February 9, 2021 9:00 pm
Debtor	:		
	:	Chapter	13
Freedom Mortgage Company	:		
Movant	:	CERTIFICATION OF DEBTORS ATTORNEY	
	:		
Kevin J. Purcell	:		
Respondent	:		

I, Robert G. Swan, of full; age, do hereby certify that:

1. I represent the debtor in the above listed bankruptcy case.
2. I file this certification to dispute the facts as presented in the above referenced matter.
3. Upon receipt of this motion I obtained proof of continuous mortgage payments being made by the debtor and presented them to movant's counsel.
4. The movant has responded and has verified that the mortgage account is current into the January monthly payment.

5. Upon receipt of that verification I checked with the debtor and was informed that there is currently an additional payment that was mailed on January 18, 2021 in the amount of \$2000.00 which would bring the account right up to date.

6. For the foregoing reasons I ask Your Honor to deny the movant's motion.

February 8, 2021

A handwritten signature in blue ink, appearing to read 'R. G. Swan', written over a horizontal line.

Robert G. Swan, Esquire
Attorney for Debtor/Respondent